

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

KATHLEEN REHDER CARRILLO
a.k.a. KATHLEEN REHDER CARRILLO-
FROST
541 Patton Ave
San Jose, CA 95128

Registered Nurse License No. 557444

Respondent

Case No. 2012-417

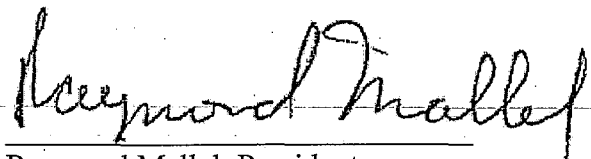
OAH No. 2012010651

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **October 24, 2012.**

IT IS SO ORDERED **September 24, 2012.**



Raymond Mallel, President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 KAMALA D. HARRIS
Attorney General of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
3 JUDITH J. LOACH
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7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2012-417

13 **KATHLEEN REHDER CARRILLO**
14 **AKA KATHLEEN REHDER CARRILLO-**
15 **FROST**
541 Patton Avenue
16 San Jose, CA 95128
Registered Nurse License No. 557444

OAH No. 2012010651

17 **STIPULATED SETTLEMENT AND**
18 **DISCIPLINARY ORDER**

19 Respondent.

20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
21 entitled proceedings that the following matters are true:

22 PARTIES

23 1. Louise R. Bailey, M.Ed., RN ("Complainant") is the Interim Executive Officer of the
24 Board of Registered Nursing. She brought this action solely in her official capacity and is
25 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
26 Judith J. Loach, Deputy Attorney General.

27 2. Respondent Kathleen Rehder Carrillo, aka Kathleen Rehder Carrillo-Frost
28 ("Respondent") is represented in this proceeding by attorney Thomas E. Still, Esq., of the Law
Offices of Hinshaw, Marsh, Still & Hinshaw, 12901 Saratoga Avenue, Saratoga, CA 95070.

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3. On or about July 26, 1999, the Board of Registered Nursing issued Registered Nurse License No. 557444 to Respondent. The Registered Nurse License was in full force and effect at all times relevant to the charges brought in Accusation No. 2012-417 and will expire on April 30, 2013, unless renewed.

JURISDICTION

4. Accusation No. 2012-417 was filed before the Board of Registered Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on December 30, 2011. Respondent timely filed her Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 2012-417 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 2012-417. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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1 CULPABILITY

2 9. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. 2012-417.

4 10. Respondent agrees that her Registered Nurse License is subject to discipline and she
5 agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

6 CONTINGENCY

7 11. This stipulation shall be subject to approval by the Board of Registered Nursing.
8 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
9 Registered Nursing may communicate directly with the Board regarding this stipulation and
10 settlement, without notice to or participation by Respondent or her counsel. By signing the
11 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
12 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
13 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
14 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
15 action between the parties, and the Board shall not be disqualified from further action by having
16 considered this matter.

17 12. The parties understand and agree that facsimile copies of this Stipulated Settlement
18 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and
19 effect as the originals.

20 13. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
21 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
22 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
23 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
24 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
25 writing executed by an authorized representative of each of the parties.

26 14. In consideration of the foregoing admissions and stipulations, the parties agree that
27 the Board may, without further notice or formal proceeding, issue and enter the following
28 Disciplinary Order:

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1 **4. Residency, Practice, or Licensure Outside of State.** Periods of residency or
2 practice as a registered nurse outside of California shall not apply toward a reduction of this
3 probation time period. Respondent's probation is tolled, if and when she resides outside of
4 California. Respondent must provide written notice to the Board within 15 days of any change of
5 residency or practice outside the state, and within 30 days prior to re-establishing residency or
6 returning to practice in this state.

7 Respondent shall provide a list of all states and territories where she has ever been licensed
8 as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide
9 information regarding the status of each license and any changes in such license status during the
10 term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing
11 license during the term of probation.

12 **5. Submit Written Reports.** Respondent, during the period of probation, shall submit
13 or cause to be submitted such written reports/declarations and verification of actions under
14 penalty of perjury, as required by the Board. These reports/declarations shall contain statements
15 relative to Respondent's compliance with all the conditions of the Board's Probation Program.
16 Respondent shall immediately execute all release of information forms as may be required by the
17 Board or its representatives.

18 Respondent shall provide a copy of this Decision to the nursing regulatory agency in every
19 state and territory in which she has a registered nurse license.

20 **6. Function as a Registered Nurse.** Respondent, during the period of probation, shall
21 engage in the practice of registered nursing in California for a minimum of 24 hours per week for
22 6 consecutive months or as determined by the Board.

23 For purposes of compliance with the section, "engage in the practice of registered nursing"
24 may include, when approved by the Board, volunteer work as a registered nurse, or work in any
25 non-direct patient care position that requires licensure as a registered nurse.

26 The Board may require that advanced practice nurses engage in advanced practice nursing
27 for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

28 If Respondent has not complied with this condition during the probationary term, and

1 Respondent has presented sufficient documentation of her good faith efforts to comply with this
2 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an
3 extension of Respondent's probation period up to one year without further hearing in order to
4 comply with this condition. During the one year extension, all original conditions of probation
5 shall apply.

6 7. **Employment Approval and Reporting Requirements.** Respondent shall obtain
7 prior approval from the Board before commencing or continuing any employment, paid or
8 voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
9 performance evaluations and other employment related reports as a registered nurse upon request
10 of the Board.

11 Respondent shall provide a copy of this Decision to her employer and immediate
12 supervisors prior to commencement of any nursing or other health care related employment.

13 In addition to the above, Respondent shall notify the Board in writing within seventy-two
14 (72) hours after she obtains any nursing or other health care related employment. Respondent
15 shall notify the Board in writing within seventy-two (72) hours after she is terminated or
16 separated, regardless of cause, from any nursing, or other health care related employment with a
17 full explanation of the circumstances surrounding the termination or separation.

18 8. **Supervision.** Respondent shall obtain prior approval from the Board regarding
19 Respondent's level of supervision and/or collaboration before commencing or continuing any
20 employment as a registered nurse, or education and training that includes patient care.

21 Respondent shall practice only under the direct supervision of a registered nurse in good
22 standing (no current discipline) with the Board of Registered Nursing, unless alternative methods
23 of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are
24 approved.

25 Respondent's level of supervision and/or collaboration may include, but is not limited to the
26 following:

27 (a) Maximum - The individual providing supervision and/or collaboration is present in
28 the patient care area or in any other work setting at all times.

1 (b) Moderate - The individual providing supervision and/or collaboration is in the patient
2 care unit or in any other work setting at least half the hours Respondent works.

3 (c) Minimum - The individual providing supervision and/or collaboration has person-to-
4 person communication with Respondent at least twice during each shift worked.

5 (d) Home Health Care - If Respondent is approved to work in the home health care
6 setting, the individual providing supervision and/or collaboration shall have person-to-person
7 communication with Respondent as required by the Board each work day. Respondent shall
8 maintain telephone or other telecommunication contact with the individual providing supervision
9 and/or collaboration as required by the Board during each work day. The individual providing
10 supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to
11 patients' homes visited by Respondent with or without Respondent present.

12 9. **Employment Limitations.** Respondent shall not work for a nurse's registry, in any
13 private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse,
14 or for an in-house nursing pool.

15 Respondent shall not work for a licensed home health agency as a visiting nurse unless the
16 registered nursing supervision and other protections for home visits have been approved by the
17 Board. Respondent shall not work in any other registered nursing occupation where home visits
18 are required.

19 Respondent shall not work in any health care setting as a supervisor of registered nurses.
20 The Board may additionally restrict Respondent from supervising licensed vocational nurses
21 and/or unlicensed assistive personnel on a case-by-case basis.

22 Respondent shall not work as a faculty member in an approved school of nursing or as an
23 instructor in a Board approved continuing education program.

24 Respondent shall work only on a regularly assigned, identified and predetermined
25 worksite(s) and shall not work in a float capacity.

26 If Respondent is working or intends to work in excess of 40 hours per week, the Board may
27 request documentation to determine whether there should be restrictions on the hours of work.

28 10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll and

1 successfully complete a course(s) relevant to the practice of registered nursing no later than six
2 months prior to the end of her probationary term.

3 Respondent shall obtain prior approval from the Board before enrolling in the course(s).
4 Respondent shall submit to the Board the original transcripts or certificates of completion for the
5 above required course(s). The Board shall return the original documents to Respondent after
6 photocopying them for its records.

7 **11. Cost Recovery.** Respondent shall pay to the Board costs associated with its
8 investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
9 amount of \$ 4,657.00. Respondent shall be permitted to pay these costs in a payment plan
10 approved by the Board, with payments to be completed no later than three months prior to the end
11 of the probation term.

12 If Respondent has not complied with this condition during the probationary term, and
13 Respondent has presented sufficient documentation of her good faith efforts to comply with this
14 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an
15 extension of Respondent's probation period up to one year without further hearing in order to
16 comply with this condition. During the one year extension, all original conditions of probation
17 will apply.

18 **12. Violation of Probation.** If Respondent violates the conditions of her probation, the
19 Board after giving Respondent notice and an opportunity to be heard, may set aside the stay order
20 and impose the stayed discipline (revocation/suspension) of Respondent's license.

21 If during the period of probation, an accusation or petition to revoke probation has been
22 filed against Respondent's license or the Attorney General's Office has been requested to prepare
23 an accusation or petition to revoke probation against Respondent's license, the probationary
24 period shall automatically be extended and shall not expire until the accusation or petition has
25 been acted upon by the Board.

26 **13. License Surrender.** During Respondent's term of probation, if she ceases practicing
27 due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation,
28 Respondent may surrender her license to the Board. The Board reserves the right to evaluate

Respondent's request and to exercise its discretion whether to grant the request, or to take any other action deemed appropriate and reasonable under the circumstances, without further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent will no longer be subject to the conditions of probation.

Surrender of Respondent's license shall be considered a disciplinary action and shall become a part of Respondent's license history with the Board. A registered nurse whose license has been surrendered may petition the Board for reinstatement no sooner than the following minimum periods from the effective date of the disciplinary decision:

(1) Two years for reinstatement of a license that was surrendered for any reason other than a mental or physical illness; or

(2) One year for a license surrendered for a mental or physical illness.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Thomas E. Still, Esq. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 6-15-2012

Kathleen Rehder Carrillo-Frost
KATHLEEN REHDER CARRILLO-FROST
Respondent

I have read and fully discussed with Respondent the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 6-15-12

Thomas E. Still, Esq.
THOMAS E. STILL, ESQ.
Attorney for Respondent

ENDORSEMENT

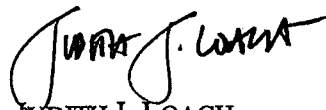
The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated:

JUNE 18, 2012

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
FRANK H. PACOE
Supervising Deputy Attorney General


JUDITH J. LOACH
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 2012-417

1 KAMALA D. HARRIS
Attorney General of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
3 JUDITH J. LOACH
Deputy Attorney General
4 State Bar No. 162030
455 Golden Gate Avenue, Suite 11000
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E-mail: Judith.Loach@doj.ca.gov
7 Attorneys for Complainant

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11 **STATE OF CALIFORNIA**

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Case No. 2012-417

13 **KATHLEEN REHDER CARRILLO**
14 **541 Patton Avenue**
San Jose, CA 95128
Registered Nurse License No. 557444

ACCUSATION

15 Respondent.

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17 Complainant alleges:

18 PARTIES

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
20 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
21 Consumer Affairs.

22 2. On or about July 26, 1999, the Board of Registered Nursing issued Registered Nurse
23 License Number RN 557444 to Kathleen Rehder Carrillo ("Respondent"). The Registered Nurse
24 License was in full force and effect at all times relevant to the charges brought herein and will
25 expire on April 30, 2013, unless renewed.

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4. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

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8. California Code of Regulations, title 16, section 1443, states:

"As used in Section 2761 of the code, 'incompetence' means the lack of possession of or the failure to exercise that degree of learning, skill, care and experience ordinarily possessed and exercised by a competent registered nurse as described in Section 1443.5."

9. California Code of Regulations, title 16, section 1443.5 states:

"A registered nurse shall be considered to be competent when he/she consistently demonstrates the ability to transfer scientific knowledge from social, biological and physical sciences in applying the nursing process, as follows:

"(1) Formulates a nursing diagnosis through observation of the client's physical condition and behavior, and through interpretation of information obtained from the client and others, including the health team.

"(2) Formulates a care plan, in collaboration with the client, which ensures that direct and indirect nursing care services provide for the client's safety, comfort, hygiene, and protection, and for disease prevention and restorative measures.

"(3) Performs skills essential to the kind of nursing action to be taken, explains the health treatment to the client and family and teaches the client and family how to care for the client's health needs.

• • •

"(5) Evaluates the effectiveness of the care plan through observation of the client's physical condition and behavior, signs and symptoms of illness, and reactions to treatment and through communication with the client and health team members, and modifies the plan as needed.

"(6) Acts as the client's advocate, as circumstances require, by initiating action to improve health care or to change decisions or activities which are against the interests or wishes of the client, and by giving the client the opportunity to make informed decisions about health care before it is provided."

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1 COST RECOVERY

2 10. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licentiate found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case.

6 STATEMENT OF FACTS

7 11. At all relevant times, Respondent was employed as a labor and delivery nurse at
8 Santa Clara Valley Medical Center ("SCVMC") in San Jose, California.

9 12. Patient S.B. ("S.B.") was admitted to SCVMC on July 9, 2006, for induction of labor.

10 13. On July 10, 2006, at approximately 7:20 a.m., Respondent assumed care of S.B., who
11 was receiving Pitocin to induce/augment her labor. The baby's heart rate was recorded by means
12 of an external fetal heart rate ("FHR") monitor.

13 14. Throughout her labor Respondent noted that the FHR was not tracing well, with
14 periods where it was intermittently recorded to there being a complete absence of recording the
15 FHR.

16 15. At some time after 10:41 a.m., when S.B. was almost fully dilated, Respondent left
17 her bedside to assist a physician with another patient. Respondent knew that the FHR monitor
18 was not recording the baby's heart rate.

19 16. From 10:41 a.m., to 10:56 a.m., there was almost a complete absence of a FHR
20 recording. At 10:57 a.m., the FHR was recorded at 90 beats per minute.¹ Then at 11:00 a.m. the
21 FHR was lost and picked up at 11:02 a.m., recording at a rate of less than 90 beats per minute
22 until 11:11 a.m. The FHR was again lost from 11:13 a.m. to 11:20 a.m.

23 17. At 11:10 a.m., a resident evaluated S.B. The attending obstetrician arrived at
24 approximately 11:20 a.m., and was told that the FHR had been in the range of 110 beats per
25 minutes. After a failed vacuum assisted delivery, the attending physician was told that staff had
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28 ¹ The normal FHR of a term infant ranges from 120 to 160 beats per minute.

1 not been able to document the FHR. An ultrasound then recorded a FHR of approximately 30
2 beats per minute.

3 18. S.B. underwent an emergency cesarean section. Her female infant, born at 11:37 a.m.
4 was admitted to the Neonatal Intensive Care Unit at SCVMC in critical condition. She was later
5 transferred to Stanford with a presumed diagnosis of hypoxic ischemic encephalopathy.

6 FIRST CAUSE FOR DISCIPLINE

7 (Gross Negligence/Incompetence – Failure to Ensure Fetal Well-Being)

8 19. Respondent is subject to disciplinary action under Code section 2761, subdivision
9 (a)(1), for gross negligence and/or incompetence in that she failed to ensure that S.B.'s fetus had
10 a normal FHR during labor. The facts in support of this cause for discipline are set forth above in
11 paragraphs 11 through 16.

12 SECOND CAUSE FOR DISCIPLINE

13 (Gross Negligence/Incompetence – Failure to Recognize Deterioration of Fetus)

14 20. Respondent is subject to disciplinary action under Code section 2761, subdivision
15 (a)(1), for gross negligence and/or incompetence in that she failed to timely recognize the
16 deterioration of S.B.'s fetus during the course of her induced labor. The facts in support of this
17 cause for discipline are set forth above in paragraphs 11 through 17.

18 THIRD CAUSE FOR DISCIPLINE

19 (Gross Negligence/Incompetence – Continuation of Pitocin)

20 21. Respondent is subject to disciplinary action under Code section 2761, subdivision
21 (a)(1), for gross negligence and/or incompetence in that she continued to administer Pitocin to
22 S.B., when she was unable to determine the well-being of her fetus. The facts in support of this
23 cause for discipline are set forth above in paragraphs 11 through 16.

24 FOURTH CAUSE FOR DISCIPLINE

25 (Gross Negligence/Incompetence – Failure to Timely Summon Medical Assistance)

26 22. Respondent is subject to disciplinary action under Code section 2761, subdivision
27 (a)(1), for gross negligence and/or incompetence in that she failed to timely summon medical
28 assistance when the FHR tracing was lost, thus precluding her ability to determine the well-being

1 of the fetus. The facts in support of this cause for discipline are set forth above in paragraphs 16
2 and 17.

3 FIFTH CAUSE FOR DISCIPLINE

4 (Gross Negligence/Incompetence – Failure to Give Accurate Report of FHR Status)

5 23. Respondent is subject to disciplinary action under Code section 2761, subdivision
6 (a)(1), for gross negligence and/or incompetence in that she failed to accurately report the FHR of
7 S.B.'s infant when requested by the attending obstetrician. The facts in support of this cause for
8 discipline are set forth above in paragraph 17.

9 SIXTH CAUSE FOR DISCIPLINE

10 (Gross Negligence/Incompetence – Leaving Patient Unattended)

11 24. Respondent is subject to disciplinary action under Code section 2761, subdivision
12 (a)(1) for gross negligence and/or incompetence in that at approximately 10:41 a.m., she left S.B.
13 unattended until approximately 11:00 a.m. The facts in support of this cause for discipline are set
14 forth above in paragraphs 15 and 16.

15 SEVENTH CAUSE FOR DISCIPLINE

16 (Incompetence – Failure to Document FHR Status)

17 25. Respondent is subject to disciplinary action under Code section 2761, subdivision
18 (a)(1), for incompetence in that she failed to adequately document the FHR of S.B.'s infant
19 and/or document her communication with health care providers regarding the status of S.B.'s
20 fetus during labor. The facts in support of this cause for discipline are set forth above in
21 paragraphs 13 through 17.

22 PRAYER

23 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
24 and that following the hearing, the Board of Registered Nursing issue a decision:

25 1. Revoking or suspending Registered Nurse License Number 557444, issued to
26 Kathleen Rehder Carrillo;

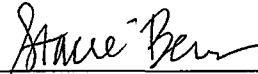
27 2. Ordering Kathleen Rehder Carrillo to pay the Board of Registered Nursing the
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1 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
2 Professions Code section 125.3; and

3 3. Taking such other and further action as deemed necessary and proper.

4 DATED: _____

12/30/2011



5 for LOUISE R. BAILEY, M.ED., RN
6 Executive Officer
7 Board of Registered Nursing
8 Department of Consumer Affairs
9 State of California
10 Complainant

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